



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

**FEB 21 2017**

Frank Sepiol  
Environmental Protection Manager  
Waste Management - New England/Upstate NY Area  
99 Barre Depot Road  
P.O. Box 550  
Barre, MA 01005

Re: Clean Air Act Testing Order for Fitchburg Westminster Landfill

Dear Mr. Sepiol:

The United States Environmental Protection Agency ("EPA") is evaluating whether Fitchburg Westminster Landfill, Inc. ("Fitchburg Westminster Landfill"), located at 101 Fitchburg Road Westminster, MA, is in compliance with the Clean Air Act (the "CAA" or "Act") and state and federal regulations promulgated under the Act. These CAA requirements include: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, promulgated at 40 C.F.R. Part 63, Subpart ZZZZ ("Subpart ZZZZ"); Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, promulgated at 40 C.F.R. Part 60, Subpart JJJJ ("Subpart JJJJ"); and Title V operating permit requirements.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

This Testing Order requires Fitchburg Westminster Landfill to conduct performance testing according to the procedures/methods and in accordance with the schedule described below.

## **Testing Order**

**Develop a site-specific test plan for EPA approval, and subsequently conduct three one-hour test runs for each of the three Caterpillar Model 3520 reciprocating internal combustion engines. Specifically:**

### **Operating Conditions**

1. Operate each engine between 90 and 100 percent of full load capacity during each run; and
2. Operate each engine utilizing as much landfill gas as available. Note that to maximize the usage of each engine, it may be necessary to operate one engine at a time.

### **Methods**

3. Sample and measure the percent methane;
4. Sample and measure the heat content (British thermal units per standard cubic feet, Btu/scf) of the landfill gas;
5. Measure stack gas flow rate and moisture;
6. Measure visible emissions using EPA Reference Method 9;
7. Measure stack gas concentrations of: oxygen; carbon monoxide; sulfur dioxide; nitrogen oxides; particulate matter (including total PM, PM10, PM2.5, and condensable PM); formaldehyde; volatile organic compounds; and NMOC; as well as the opacity of the stack gas during testing, using EPA Reference Methods.
8. Measure concentrations of hazardous air pollutants using EPA compendium Method TO-15;
9. Measure concentrations of hydrogen sulfide using EPA Reference Method 15 at the inlet and outlet locations to the Sulfa Treat system. Analyze the results using ASTM D-5504 and compare them with periodic Dragger colorimetric detection tube sampling;

### **Monitoring**

10. Measure the pressure drop and flow rate across each of the Sulfa Treat vessels during testing;
11. Measure the volume (in scf) of landfill gas consumed on a continuous basis. Record averages of the continuous data on 15 minute intervals;
12. For each engine, measure and record:

- a. The engine rating in MMBtu/hr; and
  - b. The engine output as the gross electrical output (in MW) from the generator on a continuous basis. Record averages of the continuous data on 15 minute intervals;
13. Record the following ambient conditions during testing: ambient temperature (in degrees Fahrenheit); pressure (in inches of water column); and humidity measured once every 60 minutes.

**Prepare for and conduct performance testing according to the following schedule:**

14. Within 30 days of the date Fitchburg Westminster Landfill receives this letter, contact EPA's Steve Calder, at (617) 918-1744, or Christine Sansevero, at 617-918-1699, to schedule a conference. At this conference, EPA will review with Fitchburg Westminster Landfill the testing procedures and methods described above and discuss the development of a site-specific test plan.
15. Within 60 days of the date Fitchburg Westminster Landfill receives this letter, prepare and mail to EPA for review a site-specific test plan, which incorporates the procedures/methods described above.
16. Within 30 days of receiving EPA comments on the site-specific test plan, Fitchburg Westminster Landfill shall revise and resubmit the site-specific test plan in accordance with EPA's comments or required changes. EPA shall approve, approve with conditions, or disapprove the revised site-specific test plan in writing.
17. Within 30 days of the date EPA approves the site-specific test plan, Fitchburg Westminster Landfill shall hold a pre-test meeting with EPA and schedule the performance testing date(s). The performance tests must take place no later than 60 days from the pre-test meeting.
18. Within 45 days of completing the performance tests, Fitchburg Westminster Landfill shall submit a complete and accurate test report to EPA.

Note that Attachment A to this Testing Order lists required elements for site-specific test plans and test reports.

Be aware that if Fitchburg Westminster Landfill does not conduct the performance testing required by this Testing Order in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information associated with this Testing Order, in the manner described by 40 CFR § 2.203(b). Information covered by

such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien  
US EPA Region 1  
Mail Code OES04-2  
5 Post Office Square Suite 100  
Boston, Massachusetts, 02109-3912  
Attn: Steve Calder

If you have any questions regarding this Testing Order, please contact, Environmental Engineer, Steve Calder, at (617) 918-1744, or have your attorney call, Senior Enforcement Counsel, Tom Olivier, at (617) 918-1737.

Sincerely,



Susan Studlien, Director  
Office of Environmental Stewardship

cc: Roseanna Stanley, MassDEP, CERO